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August 1, 2025

VIA ECF

Honorable Cheryl L. Pollak
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Renata Kociubinski et al v. NYC Health and Hospital Corp.,
22 Civ. 2865 (ENV)(CLP)

Dear Judge Pollak:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and represent Defendant in the above-captioned matter. I write respectfully on behalf of Defendant to request that the time to file our Joint Pre-Trial Order be stayed.

This matter was recently referred to me for handling. Upon assignment, I reviewed the pleadings and explored the possibility of settlement with my client. Following additional legal research, Defendant believes that there are no genuine issues of material fact requiring trial. Plaintiffs are four Cath Lab nurses employed by NYC Health + Hospitals at Coney Island Hospital and allege violations of the Fair Labor Standards Act ("FLSA"). Defendant intends to move for summary judgment on the grounds that Plaintiffs may be exempt from the FLSA under the "learned professional" exemption. See *Bongat v. Fairview Nursing Care Center, Inc.*, 341 F. Supp. 2d 181 (E.D.N.Y. 2004) (recognizing that nurses can qualify as exempt under 29 C.F.R. § 541.301).

Accordingly, Defendant is simultaneously requesting leave from District Judge Vitaliano to respectfully requesting that the Court schedule a pre-motion conference or, in the alternative, set a briefing schedule for a Motion for Summary Judgment.

Thank you for Your Honor's consideration of this request.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "SG Chazin", written in a cursive style.

Sonya Gidumal Chazin
Assistant Corporation Counsel

cc: All Counsel of Record (via ECF)